



NATIONAL WILDLIFE FEDERATION®

People and Nature: Our Future Is in the Balance

Rocky Mountain Natural Resource Center

December 10, 1999

Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, CO 80228

Dear Clifford Hawkes:

The National Wildlife Federation ("NWF") and the InterTribal Bison Cooperative ("ITBC") submit the following comments on the Winter Use Plan Draft Environmental Impact Statement ("EIS") for Yellowstone and Grand Teton National Parks ("GYA"). NWF submits these comments on behalf of its four million members and the undersigned state affiliate organizations of Wyoming, Montana, and Idaho wildlife federations.

ITBC is a non-profit 501 (c) (3) tribal organization and is committed to reestablishing buffalo herds on Indian lands in a manner that promotes cultural enhancement, spiritual revitalization, ecological restoration, and economic development. ITBC is governed by a Board of Directors, which is comprised of one tribal representative from each member tribe. The role of the ITBC, as established by its membership, is to act as a facilitator in coordinating education and training programs, developing marketing strategies, coordinating the transfer of surplus buffalo from national parks to tribal lands, and providing technical assistance to its membership in developing sound management plans that will help each tribal herd become a successful and self-sufficient operation.

NWF is a non-profit conservation organization whose mission is to educate, inspire and assist individuals and organizations of diverse cultures to conserve wildlife and other natural resources and to protect the Earth's environment in order to achieve a peaceful, equitable and sustainable future. NWF supports this mission statement with legal, scientific and advocacy expertise with a common sense approach to problem solving.

The Idaho Wildlife Federation is Idaho's oldest statewide conservation organization, formed in 1936. IWF represents over 5,000 members and affiliated club members who share a passion for hunting, fishing, and wildlife. IWF is committed to protecting fish and wildlife habitat through public education and governmental interaction.

The Montana Wildlife Federation is a statewide citizen-based organization dedicated to the perpetuation of wildlife, wildlife habitat, and wildlife related recreational opportunities for sportsmen and sportswomen. With a membership of over 7500 and with 20 local affiliate clubs, the MWF today retains its historic 63 year commitment to grassroots, democratic control.

The Wyoming Wildlife Federation, a non-profit organization established in 1937, is a conservation and recreation advocacy organization. WWF consists of over 4,000 anglers, bikers, hunters and outdoor enthusiasts who share a deep commitment to protecting wildlife habitat, quality ethical hunting and fishing, and public lands in Wyoming. The WWF educates its members about pressing wildlife and recreation issues throughout the state and empowers them to take actions that protect wildlife habitat and the rights of public land users.

The GYA is considered by many as a unique place, not just from a geological and environmental perspective, but also as a model for environmental preservation. The wilderness and wildness of Yellowstone is an image important to nearly every American. From its inception as the first National Park to the recovery of the wolves, Yellowstone National Park offers a glimpse of what our nation once was, and what some areas of our nation may once again be.

With the advent of oversnow transportation accompanied by a prosperous economy, our society now has the means to recreate more frequently and even in seasons when people had been nearly excluded from Yellowstone. As a result Yellowstone has witnessed an exponential increase in winter visitors. For Yellowstone to maintain the natural values that set it apart from the rest of the country, values cherished by the American people, hard choices must be made regarding the motorized accessibility and total human visitor capacity of Yellowstone during all seasons.

We believe that rather than simply focusing on the types of vehicles people use to access the Park during the winter and what roads should be closed, groomed or open, the National Park Service ("NPS") should evaluate and plan for how many visitors it can accommodate during the winter. A winter visitor carrying capacity may be stratified by the kinds and amounts of vehicles used to access the Park. Visitation can be increased or decreased based on the impacts of the various vehicles used to access the Park. For example, different oversnow vehicles have different kinds and levels of pollution impacts on Yellowstone's resources per person carried. More people could access the Park using mass transit than individual vehicles on a quantity of emission released basis. Snow machines utilizing current technologies pollute air and water and produce more noise than technologically advanced machines. Therefore, the number of visitors accessing Yellowstone with older machines should be lower than the number of individuals using more technologically advanced machines. For the long term benefit of people and the Park's resources, addressing visitor carrying capacity based on emissions, wildlife impacts and impacts to other natural resources is the best way to approach this issue.

Our second major concern regarding the Winter use EIS is the complete and full integration between the Yellowstone Bison EIS and the Winter Use EIS. In no way should the Winter Use EIS compromise or constrain the ability of the Park Service to maintain the Yellowstone Bison Herd. It is imperative that there is no opportunity for the state of Montana to claim that a change in winter access management now removes previous constraints to lethal bison management within the Park.

Specific Comments and Recommendations

Management of winter access to Yellowstone must in no way via grooming or plowing initiate or facilitate the Montana Department of Livestock's argument to enter the Park and conduct bison management within the Park. Of equal concern is bison migration patterns related to transportation routes within the Park. We adamantly opposes any transportation plan that may facilitate the migration of bison from Yellowstone into the state of Montana.

Our concern is supported by 61% of surveyed Park users who agreed with the statement "I am concerned about the possible disturbance of YNP wildlife in the winter." (Page 91) Page 116 states that bison migration is greatly affected by grooming. "Major movements occurred from the Pelican Valley into Hayden Valley, primarily using park-groomed roads." Overall effects of migration pattern influence is unknown, however facilitating movement may lead towards an increase in migration outside of the Park.

- ✓ *We do not support increasing the number of groomed or plowed roads and trails, nor do we support increasing the total miles of existing groomed or plowed roads and trails.*

We believe it is the duty of the NPS to fully integrate the final alternative of the Bison DEIS into this EIS to assure full compatibility and facilitation rather than to establish any contradictory plans. We urge the NPS to consider the effects of this EIS on bison and other wildlife and to integrate this EIS with the Bison DEIS.

- ✓ *We recommend integrating the Bison DEIS with the Winter Use DEIS.*

In the spirit of the above comment we believe it is integral to monitor bison migration patterns in conjunction with plowed and groomed roads and trails. Since 1967 bison, elk and other animals have been allowed to reach population levels dictated by environmental conditions. (Page 115) As bison begin to migrate on these transportation routes, these routes should be temporarily closed and not maintained. This management technique may discourage bison from migrating out of the Park.

- ✓ *We recommend creating a buffer zone for bison migration by temporarily closing roads and trails that act as bison migration routes.*

We recognize the interconnection between clean air, clean water, and healthy wildlife. Any transportation methods allowed in Yellowstone must meet appropriate Clean Air Act regulations for the Park. Yellowstone is part of the largest Class 1 airshed in the lower 48 states and requires strict emission standards to assure no diminishment of this airshed. Under EPA guidelines, the Park must maintain EPA's regulations concerning the Clean Air Act and Prevention of Significant Deterioration (PSD). Under the PSD provisions, a consumption of increment to baseline must be established and models of future consumption must be figured.

Page 95 states that National Ambient Air Quality Standards (NAAQS) violations occurred during an NPS monitoring study at West Yellowstone. Page 107 states that the major sources of air pollutants in the area are those emitted locally by motor vehicles concentrated along motorized routes, and smoke from wood fires.

- ✓ *Yellowstone is part of a Class 1 airshed, and the NPS must comply with the Clean Air Act and the Prevention of Significant Deterioration provision.*

Emissions from snowmobiles is currently a concern of many. We recommend setting a maximum limit on the amount of emissions in the Park, using the Clean Air Act as the guideline. NWF recommends limiting emissions by limiting the number of snowmobiles that may enter the Park daily. This number may fluctuate with the implementation of better snowmobile technology. This strategy will act as an incentive for the snowmobile industry to improve the emission performance of these machines.

Page 94 states that snowmobile emissions studies conducted by the NPS indicate CO (carbon monoxide) and PM (particulate matter) concentrations were high enough to cause health and air quality concerns in the following four locations:

1. West Yellowstone, Montana.
2. Along the snowmobile trail to Old Faithful.
3. In the parking area at Old Faithful.
4. Near Flagg Ranch where visitors wait to enter the Park.

- ✓ *Emissions in Yellowstone must be limited by limiting the number of snowmobiles in the Park. The maximum number may change as emissions from snowmobiles change. The maximum limit should be based on the Clean Air Act and its regulatory standards.*

Other Concerns in the EIS

Socioeconomic

For the GYA, the socioeconomic section states that economic concerns vary, are inconsistent, and are not expected to fluctuate based on changes in the Winter Use Plan. Page 84 states that because of the world-renowned recreational resources available to the public within the GYA, these sectors (retail trade relating to recreation) are expected to continue to grow in importance.

Page 89 states that economic benefits to private entrepreneurs do exist; Montana reported \$40 million in nonresident expenditures annually for snowmobile activities. Economic benefits also vary greatly within the GYA from county to county. In the context of the total economy, expenditures by winter park visitors is a small portion of total GYA annual economic output. The top three values and expectations of visitors according to a NPS survey are to view natural scenery, to have fun, and to view bison. (Page 152) Survey respondents cared least about YNP as an economic resource.

Furthermore, the purpose and mission of the National Park System is not to further local economic benefit, but rather:

"...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

- ✓ *Socioeconomic concerns for decision-making purposes in Yellowstone and other National Parks should be a lower priority compared to maintaining the natural resources of the Park.*

Public Health & Safety

The public health section of the DEIS highlights the concern for snowmobile emissions and air quality. With ambient air quality at times exceeding federal air quality standards, it is apparent that some measures must be taken to lower exposure to visitors and wildlife.

Air quality is not the only public health issue affected by the final decisions on oversnow travel. Page 98 states that from 1995 to 1998 in Yellowstone National Park, 70% of all reported vehicular accidents were snowmobile related. From a common sense perspective, snowmobile use, speed and limitation to daylight hours only must be regulated to restore a clean and safe environment for the park visitors, and wildlife.

- ✓ *Snowmobile activity must be more strictly regulated for the health and safety of the public and wildlife.*

Natural Resources

This section states that engine noise from snowmobiles and snowplanes is occasionally audible within background sound levels. Page 126 addresses the natural quiet as an essential component of Yellowstone. Natural quiet is an important element of what makes Yellowstone a national treasure. Without the sound of stillness, a great aspect of what makes Yellowstone special is gone.

"An important part of the mission of the NPS is to preserve or restore the natural soundscape associated with national parks. The natural soundscapes are the unimpaired sounds of nature, and are among the intrinsic elements that combine to form the environment of our national parks." (Pg 126)

- ✓ *We urge the NPS to implement a winter use plan that will restore maintain the natural quiet and stillness to Yellowstone.*

Cultural Resources

Page 132 addresses the ethnographic resources defined by the EIS as features of the landscape that are linked by members of a contemporary community to their traditional way of life. The EIS recognizes the Yellowstone bison herd as one of the most important ethnographic resources. Page 133 defines cultural landscapes as a reflection of human adaptation and use of natural resources and includes ethnographic landscapes. Therefore, the bison herd is not only an ethnographic resource of the utmost importance, but also as an integral part of the cultural landscape. Our organizations have collaborated for several years on bison issues. ITBC is nationally recognized as an authority on bison issues as a cultural and subsistence resource. NPS must work closely with ITBC to assure the integrity and continuity of the bison herd as an important ethnographic resource for Native Americans.

- ✓ *NPS must work with ITBC to develop appropriate management guidelines for the bison as an ethnographic resource, and for the appropriate management of all activities affecting this resource.*

Visitor Access and Circulation

Page 136 of the Draft EIS outlines the management of the 14 segments of roadways and motorized trails. The segments are either plowed or groomed at daily or bidaily frequencies. To keep with the values of Yellowstone (air quality, noise quality, human safety, natural landscape, etc.) the miles of groomed or plowed roads, and the frequency with which these roads are groomed or plowed, is excessive and compromises the purpose of the park. The burden of providing snow based recreational opportunities does not lie solely upon the Park, but also in concert with the surrounding National Forests.

- ✓ *The frequency and mileage of groomed and plowed roads and trails should be minimal. Recreational activities for motorized snowmachine users exist in the National Forests surrounding Yellowstone.*

We recognize the limitations that may be placed on snowmobilers and that some may be concerned about the local economy. However, we also recognize the vast opportunities for snowmobile use in the national forests adjacent to Yellowstone such as Shoshone National Forest to the east, Gallatin National Forest to the north, and west. A comprehensive winter use plan should incorporate all of the winter use opportunities on all of the federal lands within the GYA to more fully and completely plan for public use of these resources.

The Alternatives

We the undersigned cannot endorse any of the alternatives offered in the EIS because they fail to meet our fundamental goals of managing access by determining a visitor carrying capacity, minimizing impacts to wildlife, minimizing air, water and noise pollution and not facilitating

entry by the state of Montana to destroy the Yellowstone Buffalo Herd. Listed below are the positive and negative aspects of each of the alternatives as perceived by the undersigned.

Alternative B offers three positive actions:

1. Continue scientific studies in re: impacts of winter visitor use and park resources and close selected areas if no other possible mitigation method is available.
2. Implement information program cooperation with local communities.
3. Establish advisory committee to phase and implement emission standards.

However Alternative B establishes 6 miles of new oversnow motorized trails. An increase in trail mileage will only increase the impacts of man in Yellowstone, not minimize the impacts, therefore *We cannot endorse this alternative*. Effects on wildlife for Alternative B are nearly the same as Alternative A which are generally moderate, adverse and long-term, primarily caused by fragmenting habitat.

Alternative C recommends restricting passage from Norris to Canyon to Fishing Bridge for snowcoach use only from mid-February to mid-March. This proposal is a positive action. However, *We cannot support Alternative C* due to the establishment of winter campsites, 10 miles of new motorized trails, lengthened winter season, increased plowed roads, and an increased number of warming huts and other day-use facilities. These actions will increase the impact to the Park and will ultimately be a detriment to the wildlife. Effects on wildlife include the increased potential of displacement and avoidance of habitats along West Yellowstone to Old Faithful Road. Fragmentation caused by this alternative is negligible to minor in the short-term. This alternative slightly increases potential effects compared to alternative A.

Alternative D offers the following positive actions:

1. Implement information and enforcement program for late-night oversnow travel prohibition.
2. Close East entrance road.
3. Oversnow vehicle sound emissions must be at or less than 60 dB(A).
4. Phase in alternative fuel/lube sales.
5. Phase in more stringent standards for oversnow vehicle emissions.

However, *We cannot support alternative D* due to the establishment of 15 miles of new oversnow motorized trails. Overall, however, this alternative does decrease the effects on ungulates relative to alternative A.



1560 Concourse Dr. • Rapid City, South Dakota 57703

**NATIONAL AWARD
FOR
ENVIRONMENTAL
SUSTAINABILITY**

Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, CO 80228

As in the past, the InterTribal Bison Cooperative (ITBC) and the National Wildlife Federation (NWF) have again partnered together to submit comments on the Winter Use Plan Draft Environmental Impact Statement (DEIS) for Yellowstone and Grand Teton National Parks (GYYA). The InterTribal Bison Cooperative is an organization that is dedicated to assisting tribes in the development and restoration of bison to Native lands. ITBC is a non-profit organization comprised of 50 tribes spanning 16 states, committed to efforts that will enhance and protect the "Buffalo Nation". Therefore, our organization feels very strongly about protecting the environment, natural resources and the animals themselves.

The InterTribal Bison Cooperative fully supports the National Wildlife Federation on the comments that have been submitted on the Winter Use Plan. Though bison is the Cooperative's main concern, we feel that anything affecting the bison in Yellowstone and Grand Teton must also be taken into consideration. It is important to protect not only the animals, but all that is related to the animals which of course includes many of the issues outlined in the Winter Use Plan, such as air quality, socioeconomic, public health and safety, natural resources, cultural resources, and visitor access. We feel that the comments that have been submitted will address these issues with regards to bison and the natural resources that sustain them within Yellowstone. The impact that winter use has on the bison and other animals must be handled in a manner that will benefit and protect the wildlife that resides within the parks.

We also firmly believe, as does the NWF, that the Bison DEIS should be integrated into the Winter Use DEIS. Therefore, we would like reiterate what NWF has submitted on bison and the migration patterns. Bison migration patterns need to be monitored in relationship to groomed or plowed roads. We also strongly support the recommendation that a buffer zone be established by temporarily closing roads and trails that bison use as a means of migration.


▪ Member Tribes •


• **Alachua:** Cherylene Deer Stress • **Okefenokee:** Oke • **Confederated Salish in Kootenai:** Crow • **Crow Creek Stress:** Eastern Shoshone of OK • **Elk Valley Ranchstress:** • **Flamstead Santees Stress:** Four Rock Tribes • **Fort Belknap Crow Yentee & Asiniboina:** No-Church Nation • **Kalliput:** Lower Brack Stress • **Loyal Shoshone:** • **Mesa Grande Band of Mission Indians:** • **Modoc of OK:** Nambur People • **Nec Nez:** Northern Arapaho • Northern Cheyenne • **Omsaka Tribe of NE:** • **Omsaka Nation of WI:** • **Picuris Picuris:** • **Polarisque Polarque:** • **Poos of NE:** • **Prarie Band Potawatomi Nation:** • **Prarie Indian Chippewa:** • **Shoshed Shosh:** • **Round Valley Tribes:** • **Sau Jan Joon:** • **Santele Polarque:** • **Santees Stress of NE:** • **Sault St. Marie Chippewa:** • **Shoshone-Ramnoc:** • **Sisseton-Wahpeton Stress:** • **Southern Ute:** • **Spirit Lake Stress:** • **Spokane:** • **Stamding Rock Stress:** • **Tsao Polarque:** • **Tenagun Polarque:** • **Ute:** • **Whomance of NE:** • **Yokama Nation:** • **Yankton Stress:**

ITBC and NWF have worked closely in the past few years on issues related to the bison and Yellowstone. We will continue to work together until we are satisfied that the best interest of the bison, and other wildlife, has been taken into consideration. ITBC is deeply committed to insuring that the bison in Yellowstone and other national parks are protected. ITBC will work with the National Park Service to develop an appropriate management plan for bison that address natural resources and cultural resources.

ITBC cannot endorse any of the alternatives that have been offered in the DEIS, but again supports NWF in the comments related to these alternatives. We feel it is very important to continue scientific studies in the park related to bison and other natural resources, and ITBC would offer its assistance to the Parks in establishing and monitoring research as it relates to bison and other wildlife.

We thank you for reviewing the comments that have been submitted on behalf of ITBC and the NWF. We hope to work with you on this issue and others related to the Buffalo Nation in the future.


Tim Wapato
Executive Director of ITBC


Louis LaRose
President of ITBC

NATIONAL WILDLIFE FEDERATION AND INTERTRIBAL BISON COOPERATIVE
<p>Page 2. Re: Determining visitor use capacities. Setting a carrying capacity is a highly complex and potentially divisive exercise. NPS managers decided there was not sufficient time available in the settlement time frame to devote to this type of analysis. Regardless of which alternative is decided upon in the Record of Decision, a carrying capacity study will be in place within two years, and the FEIS will set interim visitor use levels. More explanation of the carrying capacity issue will be included in the FEIS, and mitigation features for the alternatives will include carrying capacity analyses.</p>
<p>Page 2 and Page 3. Re: Integration of the Bison Management EIS/Plan and Winter Use EIS. NPS is working to ensure that the Winter Use Plan and the Bison Management EIS/Plan are coordinated and consistent in regard to the effects of winter use on bison.</p>
<p>Page 3. Re: No increase in groomed or motorized routes. This feature is included in alternatives A, E, F, and G. Expressions of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. There is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.</p>
<p>Page 3. Re: Closing the roads that allow for the migration of bison out of the park. The bison analysis will be reviewed and updated as necessary. In an effort to better understand the relationship of bison movements and the use of the winter groomed road system, managers have instituted studies that address this issue. While groomed roads may have contributed to the redistribution of bison within park boundaries (Meagher 1997), it appears that bison tend to use waterways and off-road trails for much of their travel on the west side of the park (Bjornlie and Garrott 1998), and that much of their movement toward park boundaries may occur on such routes. Monitoring of bison movements in the Hayden Valley and Mammoth to Gibbon Falls sections of the park has revealed that less than 12% of bison movements occurred on the groomed road surface (Kurz et al. 1998, 1999). However, groomed roads may have allowed larger numbers of bison to exist in the park than in the absence of groomed roads, by allowing access to otherwise unavailable foraging areas, and westward redistribution early in the winter may predispose some bison to exit the park (Meagher 1997). Therefore, closing of groomed roads could have the effect of reducing population size and shifting distribution back to patterns observed before grooming, thereby possibly reducing the magnitude of bison movements outside park boundaries. Conversely, bison are highly social and appear to retain and pass along knowledge through generations (Meagher 1985). Thus, it is possible that closing groomed roads may not impact bison movements and distribution. Research is currently being conducted to better understand the relationship between road grooming and bison movement and distribution patterns.</p>
<p>Page 4. Re: Legal mandates. The NPS fully intends to comply with the Clean Air Act and the Prevention of Significant Deterioration provision. Additional work is being accomplished on air quality, including the modeling of air quality impacts, which will be incorporated into the FEIS.</p>
<p>Page 4. Re: Setting a maximum limit on emissions. Limiting emission levels will be addressed in the FEIS under the context of setting carrying capacities. More explanation of the carrying capacity issue will be included in the FEIS, and mitigation features for the alternatives will include carrying capacity analyses. Furthermore, additional work is being accomplished on air quality and will be incorporated into the FEIS.</p>
<p>Page 5. Socioeconomic concerns should be a lower priority compared to maintaining natural resources. Under NEPA, there are no specific regulations requiring the protection of social values, but the consideration of social and economic impacts are routinely done in any environmental analysis. There are several major reasons for this. First, the scoping process as conducted under §1501.7 inevitably raises the social and economic effects of a proposed action. In many instances, these are regarded as significant issues. Second, the impacts must be considered in the context of society as a whole, the affected region, the affected interests, and the locality (§1508.27(a)). Third, the intensity of impacts on the quality of the human environment must be gauged (§1508.27(b)), where “human environment” is to be viewed comprehensively (§1508.14). Effects (direct, indirect and cumulative) are defined as including both economic and social impacts (§1508.8). The NPS mandate, as stated in the Organic Act and General Authorities Act, emphasizes protection of park resources above all other park values, including socioeconomic. It will be up to the decision-maker to weigh the available data, evaluate the possible impacts of each alternative, and decide if park resources are impaired. The impacts in question are not on their face indisputable, and it is the function of an EIS to focus the issues by addressing those impacts as well as possible.</p>

NATIONAL WILDLIFE FEDERATION AND INTERTRIBAL BISON COOPERATIVE

Page 5. Re: Additional socioeconomic concerns. NPS should regulate snowmobiling for the health and safety of the public and wildlife. The effects of snowmobiling on the public and on wildlife were assessed for all alternatives. The commenter's opinions will be considered in making the final decision, but there is nothing in this suggestion that would alter the range of alternative features to be evaluated in the FEIS. Expressions of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. There is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made. 3) NPS should implement a winter use plan that will restore and maintain the natural quiet and stillness. The effects of noise on the natural quiet of the parks were assessed for all alternatives. Additional information acquired since the DEIS will be incorporated into the FEIS. See also response to Point 2 above.

Page 6. Re: 1) NPS working with ITBC. NPS received and will consider comments on the DEIS from the ITBC. Throughout the planning process, NPS has and will continue to consult with the eight contemporary American Indian Tribes traditionally affiliated with the GYA (P. 133).

Page 6 Re: Frequency and mileage of groomed roads should be minimal. Several alternatives include provisions for decreasing the mileage of groomed roads over the current scenario. Expressions of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. There is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.

Page 6. Re: None of the alternatives are supported. Statements of opposition relate to the decision that the commenter would like to see NPS make. Please see earlier response to this letter in regard to page 5 "Socioeconomic concerns."

Page 7. Re: Statements of opposition relate to the decision that the commenter would like to see NPS make. Please see earlier response to this letter in regard to page 5 "Socioeconomic concerns."

Page 8. Statements of opposition relate to the decision that the commenter would like to see NPS make. Please see earlier response to this letter in regard to page 5 "Socioeconomic concerns."

Page 8. Re: Modify alternative F to include visitor use carrying capacity. Please see earlier response to this letter in regard to page 5 "Socioeconomic concerns."

Setting a carrying capacity is a highly complex and potentially divisive exercise. NPS managers decided there was not sufficient time available in the settlement time frame to devote to this type of analysis. Regardless of which alternative is decided upon in the Record of Decision, a carrying capacity study will be in place within two years, and the FEIS will set interim visitor use levels. More explanation of the carrying capacity issue will be included in the FEIS, and mitigation features for the alternatives will include carrying capacity analyses.